

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

**MUHAMMAD TANVIR, JAMEEL
ALGIBHAH, and NAVEED SHINWARI,**

Plaintiffs,

v.

FNU TANZIN, *et al.*,

Defendants.

Case No. 13-CV-6951 (RA)

MOTION TO WITHDRAW AS ATTORNEY FOR PLAINTIFFS

PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 1.4, Ramzi Kassem respectfully moves to withdraw as counsel in the above-captioned case. I am on leave from the CLEAR Project of Main Street Legal Services, Inc. at CUNY School of Law in order to assume duties for a period of U.S. government service. Co-counsel at CLEAR as well as at the Center for Constitutional Rights and at Debevoise & Plimpton LLP shall remain counsel of record for Plaintiffs in this action. In support of this Motion, I submit the annexed Declaration of Ramzi Kassem. Pursuant to Local Civil Rule 1.4, a copy of this Motion has been served on all parties via ECF.

Dated: June 26, 2022
New York, NY

Respectfully submitted,

_____/s/_____

**RAMZI KASSEM
CLEAR PROJECT
MAIN STREET LEGAL SERVICES, INC.
CUNY SCHOOL OF LAW
2 COURT SQUARE WEST**

LONG ISLAND CITY, NY 11101

(t) (718) 340-4558

(f) (718) 340-4478

(e) ramzi.kassem@law.cuny.edu

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DECLARATION OF RAMZI KASSEM

Pursuant to 28 U.S.C. § 1746, I certify that the following is true and correct to the best of my knowledge:

1. My name is Ramzi Kassem. I am a Professor of Law at the City University of New York (CUNY) School of Law, where I am the founding director of the Creating Law Enforcement Accountability & Responsibility or CLEAR Project. I am an attorney admitted to practice law in the State of New York and I serve as pro bono counsel for Plaintiffs in the above-captioned matter.
2. The procedural posture of this case is as follows: on remand from the U.S. Supreme Court, Defendants' renewed Motion to Dismiss is presently before the Court.
3. I move to withdraw as counsel for Plaintiffs in this case because I am on leave from the CLEAR Project of Main Street Legal Services, Inc. at CUNY School of Law in order to assume duties for a period of U.S. government service.
4. My leave from the CLEAR Project constitutes good cause for my withdrawal as an attorney in this case.
5. I have conferred with Plaintiffs about my withdrawal from the case.
6. Attorneys with the CLEAR Project will continue to represent Plaintiffs in this matter, along with co-counsel at the Center for Constitutional Rights and at Debevoise & Plimpton LLP.
7. There is no retaining or charging lien involved in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York City on this 26th day of June, 2022.

_____/s/_____

RAMZI KASSEM
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CUNY SCHOOL OF LAW
2 COURT SQUARE WEST
LONG ISLAND CITY, NY 11101
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